

## DEFENDANTS' PROPOSED VOIR DIRE QUESTIONS

1. What is your highest level of education and what educational degrees have you achieved? What was your primary field of study?
2. What is your current occupation, or most recent occupation if you are retired or currently unemployed? Have you always worked similar types of jobs in the same industry, or have you changed professions at some point in your career? If yes, what did you do before?
3. What groups and/or organizations do you belong to and what, if any, leadership positions do you hold in them? These could include social, charitable, religious, political or professional organizations.
4. Have any of you ever worked for an investment bank? If yes, which banks, for how long, what position or positions did you hold and what were your job duties. Did you ever deal with clients at this job? What types of clients did you deal with?
5. Have any of your family members or close friends ever worked for an investment bank? If yes, who, which banks, and what did they do at the bank? Did you ever discuss their work specifically or investment banking generally with them?
6. Have any of you ever had dealings with an investment bank either personally or as a part of your job? If yes, what was the nature of those dealings, with which banks did you have dealings, and for how long have you dealt with investment banks?
7. Have any of you ever worked in any aspect of the lending industry? If yes, what were the names of your employers, for how long did you work at each, what were the positions you held and what were your job duties. In any of your various positions, were you ever involved in reviewing, evaluating or approving loan applications?
8. Have you ever had a job in the securities industry, whether it involved buying or selling stock, investing in the stock market, researching stocks, giving investment advice or managing investment portfolios. If yes, please explain, including your job title, job duties, length of time you held the position, and name of employer.
9. How knowledgeable are you about the stock market and investing? How often, if at all, do you follow the stock market? What are your main sources of information about the stock market and investing?
10. Are you currently invested in the stock market? If yes, how long have you invested in the stock market? Do you invest through a retirement account such as a 401k, through a broker,

or do you trade on your own? Would you say that you have developed any kind of expertise on securities, investing or the stock market?

- a. If you are not currently invested, have you ever invested in the stock market? If yes, did you have any kind of negative experience that caused you to stop investing? Is there anything about that experience that raises questions in your mind whether you could set it aside and decide this case based solely on the evidence presented in court or the law as I instruct you?
- b. Have you, a family member, or close friend ever lost a significant amount of money in the stock market, either in an investment account or a retirement account such as pension plan or a 401K? If yes, was this recent? Is there anything about that experience that might affect your ability to be a fair and impartial juror in this case?
- c. Have you ever routinely relied on someone else to make investment decisions about which stocks to buy or sell? If yes, who and for how long? If yes, who? Were they a broker, family member or someone else?
- d. Have you ever had a dispute with anyone you relied on to make investment decisions? Did you ever file a formal complaint or file a lawsuit against this person or entity? If yes, please explain.

11. Have you ever followed any cases about alleged illegal conduct involving the buying or selling of stocks? If yes, which cases? Which sources of information about this case did you follow?
12. Have you, a family member or close friend ever been a victim of fraud or any other type of financial crime? If yes, please explain, including who, the nature of the crime, how long ago it was, and the outcome.
13. Do you have any strong positive or negative opinions about securities laws or the regulation of the stock market and investors? If yes, please explain.
14. Do you have any strong positive or negative opinions about the stock market generally or wealthy investors specifically? If yes, please explain.
15. Have you, a family member or close friend ever worked for any state or federal agency that regulates the stock or financial markets, such as the Securities and Exchange Commission (SEC), Financial Industry Regulatory Authority (FINRA), the Federal Deposit Insurance Corporation (FDIC), etc? If yes, who, which agency, in what position and for how long?

16. Have you ever had any education or employment that involved compliance or investigations? If yes, please explain.
17. Have you seen, read or heard about this case either through the media or word of mouth? If yes, what did you see, read or hear? Did you discuss what you saw, read or heard with anyone? If yes, what were the nature of these discussions? Did you form any opinions about what happened in this case? Would you have any difficulty setting aside what you have seen, read, heard or discussed and decide this case based solely on the evidence presented in court and the law as I instruct you?
18. Generally speaking, what are your main sources of news? This could include specific newspapers, cable news networks, internet news sites, or social media sites.
19. As I have instructed you, there are two defendants in this case. Is there anything that would cause you not to be able to evaluate the defendants separately?